

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

IN RE:	Case No. 12-80220-jrs
WEINSTOCK & SCAVO, P.C.,	Chapter 7
Debtor.	Judge Sacca
WILLIAM J. LAYNG, JR., as Chapter 7 Trustee for WEINSTOCK & SCAVO, P.C., Plaintiff,	Adv. No. 21-05122-JRS
<i>v.</i>	
UNITED STATES OF AMERICA, <i>et al.</i>	
Defendants.	

**JOINT STIPULATION TO EXTEND TIME TO FILE RESPONSIVE  
PLEADING OR MOTION**

Pursuant to BLR 9006-1 and Fed. R. Bankr. P. 9006, Plaintiff William J. Layng, Jr., as chapter 7 trustee of the estate of Weinstock & Scavo, P.C. ("Plaintiff"), and Defendant the United States of America by and through its agency the United States Department of Treasury – Internal Revenue Service, ("Defendant") by and through their respective counsel, stipulate as follows:

1. On December 2, 2021, Plaintiff filed a Complaint [ECF No. 1] seeking to determine extent, validity, and priority of certain liens on property of the estate.

2. On December 3, 2021, the Court issued summons directed to Defendant [ECF No. 2].
3. Pursuant to Fed. R. Bankr. P. 7012, Defendant is required to file a responsive pleading or motion to the Complaint.
4. The parties stipulate to an extension of time for Defendant to file a responsive pleading or motion to the Complaint through February 18, 2022. This is the first extension of time to file a responsive pleading or motion and this stipulation is filed prior to expiration of the deadline.
5. This stipulation is entered into without prejudice to requesting a further extension of time and without prejudice to or waiver of any party's rights, claims, or defenses.

Dated: December 23, 2021.

**STIPULATED TO BY:**

KURT R. ERSKINE

UNITED STATES ATTORNEY

/s/ Vivieon Kelly Jones

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(with express written permission)

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Counsel for Plaintiff

**CERTIFICATE OF SERVICE**

This is to certify that I have on December 23, 2021 electronically filed the foregoing document using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to all parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program.

**I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS  
TRUE AND CORRECT.**

Dated: December 23, 2021.

KURT R. ERSKINE  
UNITED STATES ATTORNEY

s/ Vivieon Kelly Jones

VIVIEON K. JONES

Assistant U.S. Attorney